

# EXHIBIT D

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**IN THE UNITED STATES DISTRICT COURT IN AND FOR  
THE DISTRICT OF UTAH, CENTRAL DIVISION**

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ALINE FINNEMAN,

Plaintiff,

vs.

DELTA AIRLINES, INC., a Delaware  
Corporation,

Defendants.

**PLAINTIFF’S SECOND SET OF  
INTERROGATORIES AND  
REQUESTS FOR PRODUCTION TO  
DEFENDANT**

Case No. 2:19-cv-00327-HCN-CMR

Judge Howard C. Nielson, Jr.  
Magistrate Judge Cecilia M. Romero

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Plaintiff Aline Finneman (“Finneman”), by and through her attorney of record, and pursuant to Fed. R. Civ. P. 26, 33, and 34, submits her Second Set of Interrogatories and Requests for Production to Defendant Delta Airlines, Inc. (“Delta”). Delta’s answers and responses must be served to Finneman’s counsel, Stavros Law P.C., 8915 South 700 East, Suite 202, Sandy, Utah 84070, within thirty (30) days from the date of service.

**INSTRUCTIONS AND DEFINITIONS**

Finneman refers to the instructions and definitions set forth in her first set of discovery requests and incorporates those instructions and definitions herein by reference.

### **INTERROGATORIES**

**INTERROGATORY NO. 11:** Identify Finneman's "confidential sine for her nonrevenue travel," as alleged in the Position Statement.

**INTERROGATORY NO. 12:** Identify the weight of the plane for Finneman's flight from Salt Lake City to Portland, Oregon on December 17, 2017, and identify the maximum weight permitted for that flight.

**INTERROGATORY NO. 13:** Identify all OSMs in Delta's Salt Lake City location who have checked themselves into flights in the time period of 2015 through 2018. Your answer should include each OSM's name, the date he/she checked into the flight, and all documents showing or pertaining to the check-in process.

### **REQUESTS FOR PRODUCTION**

**REQUEST FOR PRODUCTION NO. 17:** Produce all documents which show, relate, or pertain to Finneman checking in overweight bags and manually entering the weight of each bag as exactly 50 pounds on December 17, 2017.

**REQUEST FOR PRODUCTION NO. 18:** Produce all documents which show, relate, or pertain to the weight of Finneman's bags on December 17, 2017. This request includes, but is not limited to, Finneman's baggage tags.

**REQUEST FOR PRODUCTION NO. 19:** Produce all documents which show, relate, or pertain to Delta's termination of Niki Alusa's sister, and the reasons for the termination decision.

**REQUEST FOR PRODUCTION NO. 20:** Produce all documents which show, relate,

or pertain to Delta's termination of Uinie Thomas, and the reasons for the termination decision.

**REQUEST FOR PRODUCTION NO. 21:** Produce documents showing communications between Niki Alusa and Lani Latu in the time period of 2016 through 2017 which refer to or pertain to: (a) Finneman; or (b) Delta's termination of Niki Alusa's sister.

Dated this 5th day of January, 2021.

STAVROS LAW P.C.

/s/ Austin B. Egan

Austin B. Egan

*Attorney for Aline Finneman*

**CERTIFICATE OF SERVICE**

I certify that on January 5, 2021, I sent the above discovery requests, via email, to:

Rick Thaler  
David Dibble  
RAY QUINNEY & NEBEKER P.C.  
36 South State Street, Suite 1400  
P.O. Box 45385  
Salt Lake City, Utah 84145

/s/ Austin B. Egan

Austin B. Egan